



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 3, 2022

**Via ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Fredy Renan Najera Montoya, S1 15 Cr. 378 (PGG)**

Dear Judge Gardephe:

In advance of the *Fatico* hearing currently scheduled for January 24, 2022 in the above-captioned matter, the Government respectfully requests that the Court enter the enclosed proposed protective order governing the handling of material to be produced by the Government pursuant to the Jencks Act and *Giglio*. Defense counsel has consented to the entry of this order on behalf of the defendant.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: \_\_\_\_\_ /s/  
Jacob Gutwillig  
Jason A. Richman  
Elinor Tarlow  
Assistant United States Attorneys  
(212) 637-2589

Cc: Defense Counsel (Via ECF)